

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES of AMERICA :
 :
v. :
 :
 :
CLARENCE JUANE GAMBILL : CRIMINAL NO. 05-27 ERIE

MOTION TO WITHDRAW AS COUNSEL

AND NOW, comes the undersigned, and files the following Motion to Withdraw as Counsel, averring in support thereof as follows:

1. The defendant is charged by indictment with Unlawfully Possessing With Intent to Distribute 5 grams or more of Crack Cocaine.
2. The undersigned was initially retained by the defendant to represent him regarding this matter.
3. However, the undersigned was notified by Timothy J. Lucas that he has been appointed counsel for the defendant regarding the above referenced matter.
4. To date, the undersigned has not received any Rule 16 material from the government regarding this matter.
5. In addition, the undersigned filed a Motion for the Extension of Time to File Pre-Trial Motions, said Motion being granted.
6. Pursuant to Order of this Honorable Court, the defendant was given to on or before August 22, 2005 to file any and all Pre-Trial Motions.

7. Consequently, the undersigned hereby request leave of Court to Withdraw as Counsel of Record on behalf of the defendant, Clarence Juane Gambill, regarding the above captioned matter.

WHEREFORE, the undersigned respectfully requests that this Honorable Court enter an Order granting him leave to withdraw as counsel of record on behalf of the defendant, Clarence Juane Gambill, regarding the above captioned matter.

Respectfully submitted,

By:

A handwritten signature in cursive script, appearing to read "Gene P. Placidi".

Gene P. Placidi, Esq.

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CERTIFICATE OF SERVICE

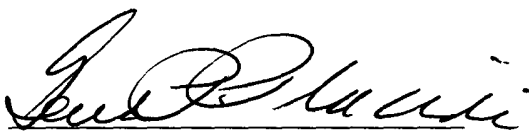
The undersigned hereby certifies that a true and correct copy of defendant's Motion for Motion to Withdraw as Counsel was served upon the following, by hand delivery or first class United States Mail, on the 14 day of July 2005, to the party listed below:

Marshall J. Piccinini
Assistant U.S. Attorney
Federal Courthouse
Room A330
17 South Park Row
Erie, PA 16501-1158

Clarence J. Gambill
2824 German Street
Erie, Pennsylvania 16504

Timothy J. Lucas, Esq.
313 French Street
Erie, Pennsylvania 16507

Respectfully submitted,

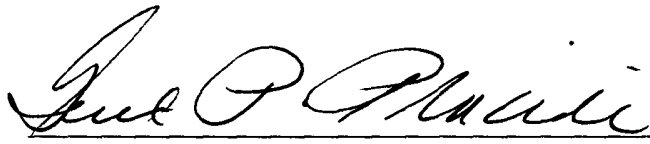
By: 
Gene P. Placidi, Esq.

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VERIFICATION

I, Gene P. Placidi, Esquire, as Attorney for the Defendant, hereby state that the facts set forth in the foregoing Motion to Withdraw as Counsel are true and correct not from my own information but from that supplied to me by Defendant, and that an Affidavit of the same to that effect will be supplied upon demand.


Gene P. Placidi, Esq.

Date: 7-18-05